



LEOPOLD GROSS, PLLC  
ATTORNEYS AT LAW

26 Court Street, Suite 1200  
Brooklyn, New York 11242  
Tel: (212) 943-4300  
Fax: (646) 943-8151

November 30, 2016

**Via ECF To:**

The Honorable Brian M. Cogan  
United States District Court, Eastern District of New York  
225 Cadman Plaza South, 704S  
Brooklyn, New York 11201

**Re: Huebner v. Midland Credit Management, Case No. 14-cv-06046-BMC**

Dear Judge Cogan:

By order dated November 10, 2016 this Court directed that “Defendant is ordered to submit proof of its fees and costs related to both its motion for sanctions and its opposition to class certification within 14 days.”

On November 23, 2016 on the eve of the Thanksgiving Day weekend defendants submitted its purported proof of fees.

Plaintiff is requesting that his time to respond to the defendants’ submission be extended to Monday December 5, 2016. This is plaintiff’s first request for an extension to reply defendants’ submission.

I contacted counsel for defendants and was informed that defendants do not consent to the within application alleging that plaintiff is not entitled to respond to defendants’ submission regarding its purported fees.

Defendants would not be prejudiced by the short extension. However, plaintiff would be prejudiced if he is not afforded an opportunity to respond to defendants’ submission.

Respectfully submitted,

/s/ Leopold Gross  
By: Leopold Gross

Cc: Via ECF To:  
Matthew B. Johnson, Esq.  
Marshal Dennehey Warner Coelman & Goggin  
*Attorneys for Defendants*

Elie C. Poltorak, Esq.  
Poltorak, PC  
*Prior Attorneys for Plaintiff*